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UBER TECHNOLOGIES, INC.
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,
22 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
PLAINTIFF'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
ITS RESPONSE TO COURT ORDER
REGARDING PATENT CLAIMS
(DKT. 825)**

Trial Date: October 10, 2017

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I, Michelle Yang, declare as follows:

1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Plaintiff's Administrative Motion to File Under Seal Its Response to Court Order Regarding Patent Claims (Dkt. 825).

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Statement of Waymo Attorney Charles Verhoeven in Response to Court Order Regarding Patent Claims (“Statement”)	Highlighted Portions
Exhibit 2	Entire Document
Exhibit 3	Entire Document

3. The highlighted portions of the Statement, and the entireties of Exhibits 1 and 2, contain highly confidential technical descriptions and diagrams of technical features of Uber's LiDAR device. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. I understand that this information could be used by competitors to Uber's detriment; for example, competitors could gain an advantage over Uber in LiDAR development by understanding the design of Uber's technical features. If this highly confidential information were made public, it would cause Uber competitive harm.

4. Defendants' request to seal is narrowly tailored to those portions of Plaintiff's Statement and supporting exhibits that merit sealing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 11th day of July, 2017, in San Francisco, California.

/s/ Michelle Yang

Michelle Yang

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

Dated: July 11, 2017

/s/ Arturo J. González

Arturo J. González